

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

JOINT STATUS REPORT

AND NOW comes the United States of America, through its counsel, Scott W. Brady, United States Attorney for the Western District of Pennsylvania, and Brendan T. Conway, Assistant U.S. Attorney for said district, and on behalf of the parties, respectfully submits this Joint Status Report.

By Order dated February 26, 2021, the Court directed the parties to meet and confer and by March 12, 2021 submit a joint proposed order setting forth agreed-upon terms regarding the protection and place and manner of production of Cybergenetics' source code. The parties did meet and confer in a good faith but ultimately unsuccessful attempt to reach complete agreement on a joint proposed order. A partial proposed Protective Order is attached hereto as Exhibit A, which reflects where the parties have reached agreement.

The parties suggest that the Court order the parties to submit proposed language additions on the areas of disagreement and a brief explaining the justification for the proposed additions by March 26, 2021. The parties further suggest that the parties submit responsive briefs by April 9, 2021. A proposed order consistent with that suggestion is attached.

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s/ Brendan T. Conway
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